

April 26, 2006

Charles Terreni Chief Clerk and Administrator South Carolina Public Service Commission Synergy Office Park 101 Executive Center Drive, Suite 100 Columbia, South Carolina 29210

Re:

South Carolina Electric & Gas Co. v. Aiken Electric Cooperative, Inc.

Docket No.: 2005-180-E SGSL No.: 5793/1501

Dear Mr. Terreni:

Enclosed for filing with the Public Service Commission please find the original and one copy of SCE&G' and Aiken Electric's Joint Motion for Stay and Continuance in the above-referenced matter. This Motion was electronically filed earlier today. Please return one clocked copy in the envelope provided.

THE

By copy of this letter and as evidenced by the Certificate of Service I am serving all parties with the same.

Thank you for your assistance in this matter.

Robert E. Tyson, Jr. rtyson@sowell.com DD 803.231.7838

1310 Gadsden Street

P- 803.929.1400

803.929.0300

Wheels www.sowell.com

Post Office Box 11449 Columbia, SC 29211 RETjr:alw Enclosure

Singerely.

cc:

(w/enclos.)

Val H. Stieglitz, Esquire Marcus A. Manos, Esquire David J. Black, Esquire

Shannon Bowyer, Hudson, Esquire

Wendy B. Cartledge, Esquire Patricia B. Morrison, Esquire



BEFORE

THE PUBLIC SERVICE COMMISSION

OF SOUTH CAROLINA

DOCKET NO.: 2005-180-E

South Carolina Electric & Gas Company)
Complainant,) SOUTH CAROLINA ELECTRIC) & GAS COMPANY AND AIKEN
vs.) ELECTRIC COOPERATIVE, INC'S) JOINT MOTION FOR STAY
) AND CONTINUANCE
Aiken Electric Cooperative, Inc.)
Defendant.)) _)

Pursuant to S.C. Code Ann. Regs. 103-840, Complainant, South Carolina Electric & Gas Company ("SCE&G"), AND Defendant, Aiken Electric Cooperative, Inc. ("Aiken"), submit this joint motion for an immediate sixty (60) day stay in the above-captioned matter and a continuation of the merits hearing scheduled for June 7, 2006. In support of this Motion, SCE&G and Aiken respectfully would show unto this Commission as follows:

1. In the Docketing Letter issued on March 7, 2006 in this Docket, the Commission established the following deadlines: SCE&G is required to file direct testimony and exhibits on or before May 10, 2006 and the direct testimony of Aiken and ORS is to be filed on or before May 24, 2006. The rebuttal testimony of SCE&G is to be filed on or before May 31, 2006, and surrebuttal testimony of Aiken and ORS is to be filed on or before June 5, 2006. The hearing in this Docket is currently scheduled for June 7, 2006.

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this case and believe an additional sixty days is necessary to continue those discussions.

Currently, SCE&G and Aiken have discussions underway that may impact

Given that this sixty day time period encompasses the scheduled merits hearing and all of

the pre-filing deadlines for testimony, at the conclusion of those discussions, SCE&G and

Aiken will request the Commission issue a Docketing Letter with new deadlines and

reschedule the merits hearing for date and time agreeable to the Commission and all

parties to this Docket.

2.

3. SCE&G and Aiken concur that all legal rights each party would assert are

preserved during the sixty day stay and agree that the neither Party will make any filing

with the Commission during this sixty day stay of any pleading unless consented to by all

Parties.

4. Counsel for SCE&G and Aiken have communicated with counsel for ORS

about this request, and ORS stated it has no objection.

5. For the foregoing reasons, SCE&G and Aiken request that the

Commission stay all deadlines in this matter for sixty days and continue the merits

hearing indefinitely.

SOWELL GRAY STEPP & LAFFITTE, L.L.C.

Robert E. Stepp

Robert E. Tyson, Jr.

1310 Gadsden Street Post Office Box 11449

Columbia, South Carolina 29211

(803) 929-1400

Patricia B. Morrison, Esquire South Carolina Electric & Gas Company 1426 Main Street Mail Code 130 Columbia, SC 29218 (803) 217-7880

Attorneys for South Carolina Electric & Gas Co.

NEXSEN PRUET, LLC

By:

J. David Black, Esquire Block

Marcus A. Manos, Esquire Val H. Stieglitz, Esquire

1441 Main Street, Suite 1500

Post Office Drawer 2426

Columbia, SC 29202-2426

Attorneys for Aiken Electric Cooperative, Inc.

Columbia, South Carolina April <u>26</u>, 2006

BEFORE

THE PUBLIC SERVICE COMMISSION

OF SOUTH CAROLINA

DOCKET NO.: 2005-180-E

South Carolina Electric & Gas Company)	
Complainant,))	
VS.) <u>CERTIFICA</u>	TE OF SERVICE
Aiken Electric Cooperative, Inc.)	
Defendant.)	
)	

I, the undersigned employee of the law offices of Sowell Gray Stepp & Laffitte, L.L.C., attorneys for South Carolina Electric & Gas Company do hereby certify that I have served a copy of the pleading(s) hereinbelow specified via electronic mail and regular mail as indicated to the following address(es):

Pleadings:

Joint Motion for Stay

Counsel Served:

David J. Black, Esquire Val H. Stieglitz, Esquire Marcus A. Manos, Esquire

Nexsen Pruet, LLC

1441 Main Street, Suite 1500 Columbia, SC 29202-2426 dblack@nexsenpruet.com

Shannon Bowyer Hudson, Esquire Wendy B. Cartledge, Esquire Office of Regulatory Staff 1441 Main Street, Suite 300 Columbia, SC 29201 shudson@regstaff.sc.gov

Robert E. Tyson, Jr.

April 26, 2006